

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES OF AMERICA)
)
 v.)
)
 STEVEN VARGAS,)
)
 Defendant.)

CRIMINAL NO. 03-10393-MLW

JOINT INITIAL STATUS MEMORANDUM

Pursuant to Local Rule 116.5, the parties hereby submit this Joint Memorandum to address issues relative to the progress of this case.

1. The parties do not seek relief from applicable timing requirements imposed by the local rule.
2. The parties do not seek discovery concerning any expert witnesses, pursuant to Fed. R. Crim. P. 16(a)(1)(E).
3. Although the government has provided to the defendant all documents and other discoverable materials in this case pursuant to automatic discovery, the government may receive additional discoverable information, which it will turn over to the defense. Additionally, the defendant does not presently have any discoverable information, but pursuant to their agreement to provide reciprocal discovery, will provide the government with any such information received in the future.
4. Based on information thus far provided, the defendant does not intend to file dispositive motions in this case at this time.
5. The parties, therefore, request that the period between May 26, 2004 (expiration of Order on Excludable Delay) and June 8, 2004 (date of Initial Status Conference) -- 14 days -- be excluded under the Speedy Trial.
6. There have been preliminary discussions between the parties regarding the possibility of an early resolution of this case, and the parties anticipate that this case will be resolved by plea agreement.

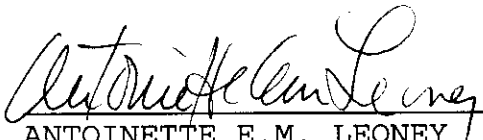
7. The parties request additional time to conclude plea negotiations.

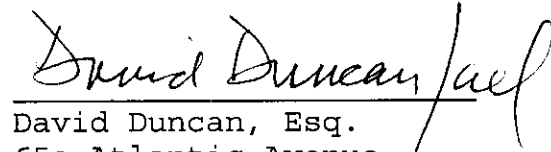
Respectfully submitted,

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STEVEN VARGAS
Defendant

By:


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Dated: June 3, 2004